PCIA *Personal Communications Industry Association*

EX PARTE OR LATE FILED

RECEIVED

JUN - 5 1997

Federal Communications Commission
Office of Secretary

June 5, 1997

DOCKET FILE COPY ORIGINAL

William F. Caton
Acting Secretary
Federal Communications Commission
Room 200, 1919 M Street, NW
Washington, D.C. 20554

Re: Ex Parte Notification
Docket No. 94-102

Dear Mr. Caton:

The purpose of this letter is to notify the Commission, pursuant to Section 1.1206(a)(2) of the Commission's Rules, that on June 4, 1997, the following parties listed below met with John Cimko, Dan Grosh, Nancy Boocker, Ron Netro and Won Kim of the Federal Communication Commission's Wireless Bureau.

The parties included: Mary Madigan of the Personal Communications Industry Association (henceforth referenced as PCIA); Craig Krueger of PCIA; Barbara Baffer of Ericsson; Ben Almond of BellSouth; Linda Lancaster of BellSouth; Gina Harrison of SBC Communications; Mary Brooner of Motorola; Gary Jones of Omnipoint; William J. Todd of PrimeCo Personal Communications; Jeremy Pemble of Siemens; Charles Spann of Nortel; Gerry Christenson of BellSouth; Terri Brooks of Nokia.

The parties discussed issues relating to the E-911 proceeding, Docket No. 94-102. The enclosed attachment was distributed to all parties attending this ex parte meeting. This attachment provides a complete summary of the issues discussed at this ex parte meeting. Should you have any questions regarding the matter, please call me.

No. of Copies rec'd 0+1
List ABCDE

Respectfully submitted,

Craig A. Krueger
Manager Government Relations-Federal Affairs

• 500 Montgomery Street • Suite 700 • Alexandria, VA 22314-1561 •
• Tel: 703-739-0300 • Fax: 703-836-1608 • Web Address: http://www.pcia.com •

WIRELESS E911 COALITION

JUNE 4, 1997

WIRELESS E911

- TTY Compatibility
- FCC Definition of Code Identified
- Routing Capabilities of Wireless E911 Calls
- PSAP Terminology

TTY COMPATIBILITY

- TTY Research Update:
  - Joint industry testing conducted (GSM only) with Siemens, Nortel, Nokia, Ericsson, Motorola, and Ultratec
  - Phase I testing (vocoder testing): completed with early indications positive.
  - Phase II testing (detailed testing: to be scheduled.
  - Cross technology efforts: Issues is being brought up at both the CDG and TDMA forum.
    - » GSM-NA has drafted formal letter to the other "standards" organizations
    - » CTIA workshop scheduled for June 13.

TTY COMPATIBILITY

- Industry Needs More Time To:
  - Develop a dialogue across digital technology forums (CDG/TDMA Forum/GSM-NA).
  - Begin preliminary testing for CDMA and TDMA.
  - Conduct detailed testing in "real world" situations for all technologies.
  - Translate test results into development and product changes.

TTY COMPATIBILITY

- Industry Needs More Time To: (cont.)
  - Solicit support from all TTY manufacturers.
  - Identify source for manufacturing specialized connectors/cables/devices.
  - Work with TTY manufacturers on retrofit program.

TTY COMPATIBILITY

- Recommendation
  - Provide industry with extension of at least 18 months.
  - This effort may require establishment of a work effort under the TIA and/or Committee T1 standards process.
  - Industry will provide periodic status updates to the FCC on progress.

ROUTING CAPABILITIES FOR WIRELESS E911 CALLS

- Each technology has different switch capabilities
  - AMPS/TDMA: two choices - all calls or only urrently service initialized (must be validated)
  - CDMA: two choices - all calls or only currently service initialized (must be validated)
  - GSM: three choices - all calls, currently service initialized calls, or all calls from a phone with a SIM
  - iDENS: two choices - all calls or only currently service initialized calls.
- Even when routing choices are available, the majority of wireless switches available today must make that routing choice on a complete switch, not an individual call basis.

ROUTING CAPABILITIES FOR WIRELESS E911 CALLS

- Radio Capabilities
  - The radio coverage area of a single base station can overlap multiple PSAPs
    - » The wireless network will not be able to accurately route calls in overlapping radio coverage areas if those PSAPs have differing requirements for handling code identified and non-code identified calls
  - CDMA technology may not guarantee a call will be delivered to the designated PSAP
  - Even if a switch could route individual calls on a code identified and non-code identified basis, **there will always be the challenge of overlapping radio coverage.**

FCC DEFINITION OF CODE IDENTIFIED

- Leaves the industry with two choices for processing E911 calls.
  - All calls or currently service initialized and validated calls
- Only phones with a subscription (service initialized) will give access to usable information (subscriber info. and call-back number) to the PSAPs.
- The Coalition plans on addressing this issue with the public safety community and will present a consensus recommendation to the FCC.

FCC DEFINITION OF CODE IDENTIFIED

- Current definition is less meaningful for some system types than for others.
  - Many "handset or subscriber identifying" numbers are not 10 digit dialable numbers.
- It is clear that code-identified and service initialized are not synonymous.
  - Phones with IMSIs, shadow MINs and IMSIs, non-dialable MINs, etc.

PSAP TERMINOLOGY

- Appropriate vs. Designated
  - Question to the FCC - Are the words synonymous?
  - If not, what are the definitions?
- Wireless systems cannot be responsible for making secondary routing decisions.
  - The wireless system must be given routing for one PSAP for each cell/sector. Secondary routing decisions can be made by intervening nodes during routing.
- Coordinated PSAP efforts are needed to insure routing consensus is reached